

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO

In re: : BANKRUPTCY NO. **10-15099 RB**  
:   
**KIEBLER RECREATION, LLC,** : THE HONORABLE RANDOLPH BAXTER  
d/b/a Peek'n Peak Resort, :   
Debtor. : CHAPTER 11

**APPEARANCE AND REQUEST FOR NOTICE**  
**OF ALL PENDING AND FUTURE MATTERS**

TO: Clerk, United States Bankruptcy Court:

Please enter our general appearance on behalf of Vincent Cross, Executor of the Estate of Norbert Cross and Raquel Cross, Executrix of the Estate of Eugene Cross, in the above-captioned bankruptcy proceedings. Papers should be served on the undersigned at the address set forth below.

Furthermore, request is hereby made that notice of all pending and future matters in the above-captioned case be given to the undersigned and that the name and address of the undersigned be added to the mailing matrix of the Debtor.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY  
& KROTO, INC.

By /s/Lawrence C. Bolla  
Lawrence C. Bolla, Esquire  
Pa. I.D. No. 19679  
Oh. I.D. No. 0067483  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
Phone: (814) 833-2222  
Fax: (814) 835-2076  
Email: lbolla@quinnfirm.com  
Attorneys for Vincent Cross, Executor for the Estate  
of Norbert Cross and Raquel Cross, Executrix of  
the Estate of Eugene Cross

Dated: June 9, 2010

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO

In re: : BANKRUPTCY NO. **10-15099 RB**  
:   
**KIEBLER RECREATION, LLC,** : THE HONORABLE RANDOLPH BAXTER  
d/b/a Peek'n Peak Resort, :   
Debtor. : CHAPTER 11

**DECLARATION IN LIEU OF AFFIDAVIT**

Regarding Request To Be Added to the Mailing Matrix

I am the Attorney for Vincent Cross, Executor of the Estate of Norbert Cross and Raquel Cross, Executrix of the Estate of Eugene Cross, creditors in the above captioned bankruptcy case, and I am authorized by this creditor to make the accompanying request for notices. The new address should be used instead of the existing address, and add to the matrix. I have reviewed the mailing matrix on file in this case and I hereby certify that the request for notices being filed herewith replaces the creditor's address listed on the matrix, supersedes and cancels all prior requests for notice by the within named creditor, and:

***Please check the appropriate box***

- ☒ that there are no other requests to receive notices on behalf of this creditor, or  
☐ that the following prior request(s) for notice by or on behalf of this creditor shall be deleted from the matrix:

\_\_\_\_\_  
Creditor's Name

\_\_\_\_\_  
Creditor's Address

\_\_\_\_\_  
City, State and Zip

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 9, 2010.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY  
& KROTO, INC.

By     /s/Lawrence C. Bolla  
Lawrence C. Bolla, Esquire  
Pa. I.D. No. 19679  
Oh. I.D. No. 0067483  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
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Attorneys for Vincent Cross, Executor for the Estate  
of Norbert Cross and Raquel Cross, Executrix of  
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**CERTIFICATE OF SERVICE OF APPEARANCE AND REQUEST FOR NOTICE  
OF ALL PENDING AND FUTURE MATTERS**

I, Lawrence C. Bolla, Esquire, certify under penalty of perjury that I served the above-captioned pleading, Appearance and Request for Notice of All Pending and Future Matters, on the parties at the addresses on the attached matrix, on June 9, 2010, by regular First Class United States mail or other method as described on the attached list.

EXECUTED ON: June 9, 2010

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY  
& KROTO, INC.

By /s/Lawrence C. Bolla  
Lawrence C. Bolla, Esquire  
Pa. I.D. No. 19679  
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2222 West Grandview Boulevard  
Erie, PA 16506-4508  
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Attorneys for Vincent Cross, Executor for the Estate  
of Norbert Cross and Raquel Cross, Executrix of  
the Estate of Eugene Cross

The following parties receive notification of the filing via the CM/ECF System and will not receive a paper copy of the filing:

Carrie M. Brosius, Esquire; <a href="mailto:cmbrosius@vorys.com">cmbrosius@vorys.com</a> ; Counsel to PNC Bank, National Association
Stephen A. Donato, Esquire; <a href="mailto:sdonato@bsk.com">sdonato@bsk.com</a> ; Counsel to The Huntington National Bank
Robert C. Folland, Esquire; <a href="mailto:rob.folland@thompsonhine.com">rob.folland@thompsonhine.com</a> ; Counsel to Kiebler Recreation, LLC
Ingrid S. Palermo, Esquire; <a href="mailto:ipalermo@bsk.com">ipalermo@bsk.com</a> ; Counsel to The Huntington National Bank
Drew T. Parobek, Esquire; <a href="mailto:dtparobek@vorys.com">dtparobek@vorys.com</a> ; Counsel to PNC Bank, National Association
Andrew L. Turscak, Esquire; <a href="mailto:Andrew.turscak@thompsonhine.com">Andrew.turscak@thompsonhine.com</a> ; Counsel to Kiebler Recreation, LLC
Mark A. Weintraub, Esquire; <a href="mailto:mark.weintraub@thompsonhine.com">mark.weintraub@thompsonhine.com</a> ; Counsel to Kiebler Recreation, LLC
Joseph Zagraniczny, Esquire; <a href="mailto:jzagraniczny@bsk.com">jzagraniczny@bsk.com</a> ; Counsel to The Huntington National Bank

Via First Class Mail, Postage Pre-Paid:

United States Trustee Howard M. Metzenbaum U.S. Courthouse 201 Superior Avenue Cleveland, OH 44114	
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